This response is submitted in response to a Final Office Action mailed September 11, 2007. Claims 1-24 were pending at the time the Office Action was issued. Applicant hereby amends Claims 1, 6, and 10. Claims 1-24 remain pending.

I.   REJECTIONS UNDER 35 U.S.C. § 112

Claim 1 is rejected under 35 U.S.C. §112, first paragraph, as failing to comply with the written description requirement. Applicant has deleted the phrase "mapped to the active portion" from Claim 1. Accordingly, Applicant respectfully requests reconsideration and withdrawal of the rejection.

II.   REJECTIONS UNDER 35 U.S.C. § 102

Claims 1-24 are rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Pub. No. 2002/0188657 to Traversat. Respectfully, Applicant submits that the claims are allowable over Traversat for at least the reasons explained in detail below.

Claims 1-11

Claims 2-11 depend from Claim 1. Claim 1, as amended, recites:

> 1.   A tangible computer-readable data storage medium having thereon computer-executable instructions for performing a method comprising:
>> maintaining, local to a peer participating in one or more communication connections, a local connection translation table, the local connection translation table, for each connection of the one or more communication connections, comprising:

original connection parameters for the connection, the original connection parameters specifying an initial network attachment point associated with original establishment of the connection between the peer and a remote peer;

current connection parameters for the connection, the current connection parameters being different from the original connection parameters if the connection no longer uses the initial attachment point for incoming and outgoing data streams;

responsive to a data stream being at an active connection of the one or more communication connections, generating, by the peer, translated connection specifications from connection specifications of the data stream using the original connection parameters and the current connection parameters; and

communicating, by the peer, the data stream using the translated connection parameters to provide peer-to-peer communications.

Applicant respectfully traverses the rejections of Claims 1-11. Specifically, Traversat does not teach or suggest, "maintaining, *local to a peer* participating in one or more communication connections, *a local connection translation table*, the local connection translation table, for each connection of the one or more communication connections," as recited in Claim 1. (Emphasis added).

First, the "peer identifier" of each peer, as disclosed by Traversat, is not equivalent to the "location connection translation table" recited in Claim 1. Traversat discloses that "a peer identifier may be bound to a network address (*e.g.,* IP address, URI, URN, or URL) of the peer. If the peer changes network address (*e.g.,* is moved to a new network address), the peer identifier may be unbound from the network address and bound to the new network address." (Paragraph 116, Lines 6-11).

In other words, a "peer identifier," as disclosed by Traversat, only bounds one network address at a time. Accordingly, a "peer identifier" is not capable of associating a "new" network address to an "old" network address. Thus, a "peer identifier" of Traversat is not equivalent to a "connection translation table" that comprises "original connection parameters" and "current connection parameters," as recited in Claim 1.

Indeed, while Traversat discloses that peers may cooperate to route messages, thereby allowing for full peer connectivity, Traversat specifically discloses that "each *message* may include either a complete or a partial ordered list of gateway peers through which the message might be routed." (Paragraph 249, Lines 9-15). Accordingly, Traversat teaches that any information regarding the routing of messages is contained in the messages themselves, rather than in any mechanism that is equivalent to a "connection translation table" which is local to a peer, as recited in Claim 1.

Second, the application 300 that supports peer-to-peer platform, as disclosed by Traversat, is also not equivalent to a "connection translation table" that is local to a peer. Traversat discloses that the application has "better knowledge of the topology (related to the nature of the application and/or peer group) than the core peer-to-peer platform." (Paragraph 395, Lines 5-10). Thus, the application is a separate from, rather than local to a peer. In contrast, a "connection translation table", as recited in Claim 1, is local to a peer.

Further, the application 300 also uses a discovery 308 to find peers. As disclosed by Traversat, the use of discovery involves "multicast" and "rendezvous and invitation" mechanisms. (Paragraph 399, Lines 3-16). Multicast and "rendezvous and invitation" mechanisms are not equivalent to a "connection

translation table", which includes original and current connections parameters, as recited in Claim 1.

Third, the discovery process used by a peer to join a peer group, as disclosed by Traversat, does not involve the use of a "connection translation table" that is local to a peer. Instead, Traversat disclosed that when a peer moves and wishes to join an original peer group that it used in a previously location, the peer "may attempt to discover other peers that have knowledge of the peer group or other peers in the peer group," or "router peers", to establish a route to the original peer group. (Paragraph 414, Lines 12-25). However, the use of these "router peers" by a peer to establish a connection to the original peer group is not equivalent to the use of a "connection translation table" that is local to a peer, as recited in Claim 1, to facilitate communication between peers.

Thus, for at least the above reason, the method recited in Claim 1 is not anticipated by Traversat. Further, since Claims 2-11 depend from Claim 1, they are allowable over the cited reference to Traversat at least due to their dependency, as well as due to additional limitations recited.

Claims 10-11 are further allowable over Traversat. Claim 10 recites:

> 10. The tangible computer-readable data storage medium of claim 6, wherein the method further comprises receiving a Connection Update message, the Connection Update message comprising:
> an original connection identifier of the peer; and
> a new network attachment point identifier of the peer.

Specifically, Traversat does not teach or suggest, *"receiving a Connection Update message,* the Connection Update message comprising: an original

connection identifier; and a new network attachment point identifier." (Emphasis added).

Traversat disclose that the peers in its peer-to-peer platform may "cooperate to route messages allowing for full peer connectivity." (Paragraph 249, Lines 8-9). However, Traversat discloses that "each message may include either a complete or a partial ordered list of gateway peers through which the message might be routed." (Paragraph 249, Lines 9-15). In other words, the message disclosed by Traversat serves to list a number of peers that are joined together in connectivity. In contrast, a Connection Update message, as recited in claim 10, includes "an original connection identifier" and "a new network attachment point identifier" for the same peer.

Moreover, the additional disclosures of Traversat, such as disclosures concerning peer identifiers, the application 300 that uses discovery 308, and multicast and "rendezvous and invitation" mechanisms, are silent with respect to receiving messages that facilitate communication between peers, wherein a message includes "an original connection identifier" and "a new network attachment point identifier." (Paragraphs 116, 395, 399, and 414). Thus, for at least the above reasons, Traversat does not teach or suggest the computer-readable data storage medium recited in Claim 10.

Additionally, since Traversat does not teach or suggest a "Connection Update message that includes "an original connection identifier" and "a new network attachment point identifier" for the same peer, as recited in Claim 10, Traversat also cannot teach or suggest, as recited in Claim 11:

> 11. The tangible computer-readable data storage medium of claim 10, wherein maintaining the local connection

translation table comprises: as a result of receiving the *Connection Update message*, updating the remote network attachment point identifier of the current connection specification of the local connection translation table entry identified by the original connection identifier of the *Connection Update message*. (Emphasis added).

Claims 12-19

Claims 13-19 depend from Claim 12. Claim 12 recites:

> 12. A tangible computer-readable data storage medium having thereon computer-executable instructions for performing a method comprising:
> > maintaining, by a local peer, a peer-to-peer connection between the local peer and one or more remote peers, by sending, as a result of the local peer changing a network attachment point from a first network attachment point to a second network attachment point, a Connection Update message to each remote peer participating in a communication connection with the local peer, the Connection Update message comprising:
> > > a communication connection identifier indicating one or more original communication session connection parameter(s) specified by the local peer to establish an initial communication connection with the local peer; and
> > > an identifier of the second network attachment point, each remote peer using the second network attachment point to communicate with the local peer.

Applicant respectfully traverses the rejections of Claims 12-19. Specifically, Traversat does not teach or suggest, sending a "*Connection Update message*," as recited in Claim 12, which comprises:

> > a communication connection identifier indicating one or more original communication session connection parameter(s) specified by the local

peer to establish an initial communication connection with the local peer; and

an identifier of the second network attachment point, each remote peer using the second network attachment point to communicate with the local peer.

First, Traversat disclose that the peers in its peer-to-peer platform may "cooperate to route messages allowing for full peer connectivity." (Paragraph 249, Lines 8-9). However, Traversat discloses that "each message may include either a complete or a partial ordered list of gateway peers through which the message might be routed." (Paragraph 249, Lines 9-15). In other words, the message disclosed by Traversat serves to list a number of peers that are joined together in connectivity. In contrast, a Connection Update message, as recited in claim 12, includes "a communication identifier "indicating one or more original communication session connection parameter(s)" and "an identifier of the second network attachment point" for the same local peer.

Second, the additional disclosures of Traversat, such as disclosures concerning peer identifiers, the application 300 that uses discovery 308, and multicast and "rendezvous and invitation" mechanisms, are silent with respect to receiving messages that facilitate communication between peers. (Paragraphs 116, 395, 399, and 414). Accordingly, these disclosures also do not teach or suggest a message includes a communication identifier "indicating one or more original communication session connection parameter(s)" and "an identifier of the second network attachment point," as recited in Claim 12.

Thus, for at least the above reasons, the computer-readable data storage medium recited in Claim 12 is not anticipated by Traversat. Further, since Claims

13-19 depend from Claim 12, they are allowable over Traversat at least due to their dependency, as well as due to additional limitations recited.

Claims 20-24

Claims 21-24 depend from Claim 20. Applicant respectfully traverses the rejections of Claims 20-24. Specifically, Applicant incorporates the reasoning presented above in response to the rejection of Claim 1 under 35 U.S.C. § 103(a), and respectfully submits that Candelore does not teach or suggest, as recited in Claim 20:

> a local connection translation component configured to, at least, maintain *a local connection translation table*, the *local connection translation table* comprising a local connection translation table entry for each active communication connection between a communication peer local to the local connection translation component and a communication peer remote to the local connection translation component, each local connection translation table entry comprising:
>
>> an original connection specification to indicate an original network attachment point used to initially establish a communication session between the communication peer local to the local connection translation component and a respective remote peer;
>>
>> a current connection specification, the current connection specification being different from the original connection specification if a peer participating in the communication session is no longer using the original network attachment point. (Emphasis added).

Furthermore, since Claims 21-24 depend from Claim 20, they are at least allowable for the same reasons that make Claim 20 allowable over Traversat, as well as for additional limitations recited.

Additionally, Claim 24 is further allowable over Traversat. Specifically, Applicant incorporates the reasoning presented above in response to the rejection of Claim 12 under 35 U.S.C. § 103(a), and respectfully submits that Traversat does not teach or suggest, as recited in Claim 24, "a connection management component configured to, at least, receive a *Connection Update message*, the *Connection Update message* comprising:

> an identifier corresponding to the original connection specification of a local connection translation table entry; and
>
> an identifier of a new network attachment point of the communication peer remote to the local connection translation component. (Emphasis added).

Accordingly, the computing device recited in Claim 24 is not anticipated by Traversat.

In closing, Applicant's decision not to discuss the differences between the cited art and each dependent claim should not be considered as an admission that Applicant concurs with the conclusions set forth in the Office Action that these dependent claims are not patentable over the disclosure in the cited references. Similarly, Applicant's decision not to discuss differences between the prior art and every claim element, or every comment set forth in the Office Action, should not be considered as an admission that Applicant concurs with the interpretation and assertions presented in the Office Action regarding those claims. Indeed, Applicant believes that all of the dependent claims patentably distinguish over the references cited. Moreover, a specific traverse of the rejection of each dependent claim is not required, since dependent claims are patentable for at least the same reasons as the independent claims from which the dependent claims ultimately depend.

CONCLUSION

Applicant respectfully requests that the above-proposed amendments be entered and that pending Claims 1-24 be allowed. If there are any remaining matters that may be handled by telephone conference, the Examiner is kindly invited to contact the undersigned attorney at the telephone number listed below.

Respectfully Submitted,

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